

**DECLARATION OF CRAIG R. ANDERSON, ESQ. IN SUPPORT OF LVMPD
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Craig R. Anderson, Esq., hereby declares as follows:

1. I am over the age of eighteen (18) years of age and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a Court of law and will so testify if called upon.

2. I am counsel for Defendants Las Vegas Metropolitan Police Department ("LVMPD"), Ofc. Kerry Kubla, Ofc. Brice Clements, Ofc. Alex Gonzales, Sgt. Russell Backman, Ofc. James Rothenburg, Ofc. James Bertuccini and Lt. Melanie O'Daniel ("LVMPD Defendants") in the case of *Latia Alexander, individually as heir of Isaiah T. Williams, and in her capacity as Special Administrator of the Estate of Isaiah T. Williams v. LVMPD, et al.*, Case No. 2:24-cv-00074-APG-NJK.

3. This Declaration is submitted to the Court to authenticate exhibits attached to the LVMPD Defendants' Motion for Summary Judgment.

4. **Exhibit A** is the deposition transcript of Plaintiff Latia Alexander. It is authenticated by the court reporter's certificate.

5. **Exhibit B** is the deposition transcript of Lt. Melanie O'Daniel. It is authenticated by the court reporter's certificate.

6. **Exhibit C** is the deposition transcript of Sgt. Rusell Backman. It is authenticated by the court reporter's certificate.

7. **Exhibit D** is the deposition transcript of Sgt. Garth Findley. It is authenticated by the court reporter's certificate.

8. **Exhibit E** is the deposition transcript of Ofc. Kerry Kubla. It is authenticated by the court reporter's certificate.

9. **Exhibit F** is the deposition transcript of Ofc. Brice Clements. It is authenticated by the court reporter's certificate.

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1 10. **Exhibit G** is the deposition transcript of Ofc. Alex Gonzales. It is
2 authenticated by the court reporter's certificate.

3 11. **Exhibit H** is the deposition transcript of Ofc. James Bertuccini. It is
4 authenticated by the court reporter's certificate.

5 12. **Exhibit I** is the deposition transcript of Ofc. James Rothenburg. It is
6 authenticated by the court reporter's certificate.

7 13. **Exhibit J** is the January 7, 2022 Search Warrant. This document is a public
8 record under Nevada Public Records Act. Its authenticity is not in dispute.

9 14. **Exhibit K** is the December 31, 2021 Search Warrant. This document is a
10 public record under Nevada Public Records Act. Its authenticity is not in dispute.

11 15. **Exhibit L** is LVMPD SWAT Manual (2021) (selected pages). It is
12 authenticated by LVMPD's SWAT Rule 30(b)(6) witness Lt. Adrian Beas at Exhibit P at 98.

13 16. **Exhibit M** is the final Incident Action Plan ("IAP"). This document was
14 utilized and produced by both parties in this litigation and defendants in good faith believe
15 that its authenticity is not in dispute.

16 17. **Exhibit N** are photographs of the stun stick. It is authenticated in Ofc.
17 Bertuccini's Deposition at Exhibit H at 34-40.

18 18. **Exhibit O** is LVMPD's Stun Stick Lesson Plan. This document was utilized
19 and produced by both parties in this litigation and defendants in good faith believe that its
20 authenticity is not in dispute.

21 19. **Exhibit P** is deposition transcript of The LVMPD Rule 30(b)(6) Witness Lt.
22 Adrian Beas regarding LVMPD's SWAT policies and procedures. It is authenticated by the
23 court reporter's certificate.

24 20. **Exhibit Q** are the body worn camera videos of:

- 25 • Sgt. Russel Backman
- 26 • Ofc. James Bertuccini
- 27 • Ofc. Kai Hoskins
- 28 • Ofc. Kerry Kubla
- Ofc. Brice Clements

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- Ofc. Alex Gonzales
- Ofc. James Rothenburg

These videos utilized and produced by both parties in this litigation and defendants in good faith believe that its authenticity is not in dispute.

21. **Exhibit R** is the deposition transcript of the LVMPD Defendants' police practices expert Spencer Fomby. It is authenticated by the court reporter's certificate.

22. **Exhibit S** is the deposition transcript of Plaintiffs' Police Practices Expert Gregory Gilbertson. It is authenticated by the court reporter's certificate.

23. **Exhibit T** are photographs of James Rothenburg's ballistic shield. This photograph was produced during discovery and utilized by both defendants in good faith believe that its authenticity is not in dispute.

24. **Exhibit U** is LVMPD's Force Investigative Team ("FIT") Report. It is authenticated in the Deposition of Reggie Rader at Exhibit V at p.4.

25. **Exhibit V** is the deposition transcript of Rule 30(b)(6) witness Chief Reggie Rader regarding LVMPD's CIRP Process. It is authenticated by the court reporter's certificate.

26. **Exhibit W** is the deposition transcript of Rule 30(b)(6) witness Justin Roth regarding LVMPD's internal investigation and the CIRT Report. It is authenticated by the court reporter's certificate.

27. Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 16th day of May, 2025.

s/Craig R. Anderson
Craig R. Anderson